EPA/FACILITY SPCC & FRP INSPECTION REVIEW Little Goose Lock and Dam Project Dayton, Washington 99328				
SPCC RULE REFERENCE	**PLAN**	**FIELD**	**INSPECTION DEFICIENCY DESCRIPTION (February 9, 2016)**	**FACILITY FOLLOW-UP**
Appendix C, Attachment C-II Certification of the Applicability of the Substantial Harm Criteria	X	NA	***"The copy of the 'Certification of the Applicability of the Substantial Harm Criteria' in the facility's plan is not signed."***	
112.3(d) Professional Engineer (PE) Certification	X	NA	Plan is certified by a registered Professional Engineer (PE). ***"The version of the plan at the facility (version: October 2010) does not match the emailed version (December 2012) that was sent to EPA in advance of the inspection. Neither version has been certified by a PE (no signature, no stamp or seal, and no date of certification)."***	
112.5(b) Plan Evaluation	X	NA	Review and evaluation of the Plan completed at least once every 5 years? ***"Section 2.3.6 of the plan stipulates an annual plan review, which is more stringent than the rule requirement of 5 years. Using the plan's more stringent requirement, the plan should have been reviewed in February 2015, but the last review in the review log (in the emailed copy) was completed in February 2014."*** ***"The plan that was made available at the facility indicates it was last updated in October 2010."*** ***"The plan that was sent to EPA by email indicates it was last revised in December 2012 (based on the cover page); the amendment log (Section 2.3.7, Table 2-1) in this version indicates that technical amendments were made in January 2011 when the entire plan was amended, and non-technical amendments (contact information changed) were made in December 2012, March 2013, and February 2014 (note that two of the dates occur after the version date indicated on the plan cover page); the review record in this version also does not include a September 2010 technical amendment to the plan that was indicated in the copy provided at the facility (version October 2010); the review log in this version (December 2012) also contains other inconsistencies compared to the copy at the facility (October 2010), such as disagreement about whether PE Certification is required for amendment."***	
112.7 General SPCC Requirements	X	NA	Management approval at a level of authority to commit the necessary resources to fully implement the Plan. ***"Management approval in Section 2.3.7 of the plan is not complete (lacks facility representative's name, signature, title, and date)."***	

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112.7(a)(2) Environmental Equivalence	X		The Plan includes deviations from the requirements of 112.7(g), (h)(2) and (3), and (i) and applicable subparts B and C of the rule, except the secondary containment requirements in 112.7(c) and (h)(1), 112.8(c)(2), 112.8(c)(11), 112.12(c)(2), and 112.12(c)(11). The Plan states reasons for nonconformance. Alternative measures described in detail and provide equivalent environmental protection. ***"Section 2.3.10 in the plan is titled 'Deviations and Alternative Measures (Environmental Equivalence) (112.7 (a)(2))' but the discussion is about oil-filled operational equipment (OFOE) installed at the facility for which secondary containment is impracticable - this discussion should be placed in Section 3.12 titled 'Practicability of Secondary Containment (40 CFR 112.7(d))' (but this section lacks any discussion of impracticability for specific OFOE)."***	
112.7(a)(3)(vi) Contact List	X	NA	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with an agreement for response, and all Federal, State, and local agencies who must be contacted in the case of a discharge as described in 112.1(b). ***"The facility contact list in the plan is not correct and needs to be updated."***	
112.7(c) Appropriate Secondary Containment	X	X	Appropriate containment and/or diversionary structures or equipment are provided to prevent a discharge as described in 112.1(b) from **oil-filled operational equipment**; **piping and related appurtenances**; and **transfer areas, equipment and activities**. The entire containment system, including walls and floors, are capable of containing oil and are constructed to prevent escape of a discharge from the containment system before cleanup occurs. The method, design, and capacity for secondary containment address the typical failure mode and the most likely quantity of oil that would be discharged. ***"Insufficient secondary containment exists in the field for the Bascule bridge mechanisms (OFOE) - oil was observed to be leaking from this system and no containment except for unattended oil sorbent pads was observed; the leaks appeared to have been occurring for an extended period of time; a floor drain to the river was located near the leaks; some leaked oil had been captured by the sorbent pads, but significant amounts of leaked oil was observed on the equipment, on support structures, and on the room floor near the floor drain; it appeared that the floor had been washed down with a hose that was observed lying on the floor near the drain."*** ***"A secondary containment dike for an oil filled transformer was***	***Corrections were in progress as of email company sent on 3/9/2016.***

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			observed to have an apparently degraded elastomeric seal for an expansion joint; the seal should be repaired or inspected to confirm that the damage is not extensive enough to result in a discharge of oil." ***"The plan does not address the fish screens (located upstream of the emergency intake gates); during the field inspection, these screens appeared to be OFOE, and do not appear to have secondary containment except for a drip bucket placed under a hydraulic oil connection."*** ***"Comment: The plan should include additional information regarding expected precipitation levels, and demonstrate that the available volume of secondary containment in structures exposed to the weather is adequate for anticipated conditions."***	
112.7(d) Impracticability Determination	X		The impracticability of secondary containment is clearly demonstrated and described in the Plan. ***"The plan states that secondary containment is impracticable for turbine hubs and head gate hydraulic cylinders, but does not demonstrate why secondary containment is impracticable."***	
112.7(f)(1)&(3) Training		X	Training of oil-handling personnel in operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and contents of SPCC Plan. Discharge prevention briefings conducted at least once a year for oil handling personnel to assure adequate understanding of the Plan. Briefings highlight and describe known discharges as described in 112.1(b) or failures, malfunctioning components, and any recently developed. ***"The training materials that the facility uses do not address the contents of the facility's SPCC plan."*** ***"No discharge prevention briefings were documented for 2013, and the facility representative stated none occurred."***	***Violation was corrected and confirmed via email company sent on 3/9/2016.***
112.8(b)(3) Undiked Drainage	X	X	Drainage from undiked areas with a potential for discharge designed to flow into ponds, lagoons, or catchment basins to retain oil or return it to facility. Catchment basin located away from flood areas. ***"The plan describes drainage in Sections 3.5 and 4.1 - in summary, a portion of the OFOE and oil transfer piping located in the dam is designed to drain to floor drains, then to the drainage sump, and then to the unwatering sump in the event of an oil discharge; once in the sump, the discharged oil could be pumped to the river if the discharge is not discovered in time and if the water flow in the sumps is turbulent; the sumps do not have oil***	***Violation was corrected and confirmed via email company sent on 3/9/2016.***

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			detection sensors, and only some of the OFOE is equipped with oil loss instrumentation to warn the operator; during the inspection, facility personnel stated that turbulent flow in the sumps could occur."	
112.8(c)(6) Tank Integrity Testing			***"Comment Only - The plan adopts both in-house monthly/annual inspection checklists and STI SP001 monthly/annual checklists, but does not clearly state which should be used; the plan should be clarified to ensure the intended checklists are used."***	